

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARC SAVAGE and)
RANDOLPH BLAKE,)
Plaintiffs,)
)
v.) Civil No. 3:18-cv-30164-KAR
)
)
)
THE CITY OF SPRINGFIELD,)
BERNARD J. CALVI, individually and)
as Fire Commissioner for the City of)
Springfield, and JOSEPH CONANT,)
individually and as former Fire)
Commissioner,)
Defendants.)
)

A. Claims of Marc Savage

1. Did Marc Savage prove by a preponderance of the evidence that any of the Defendants retaliated against him based on his participation in protected activities by subjecting him to a retaliatory hostile work environment or by other retaliatory acts?

The City of Springfield:

YES NO

Bernard Calvi:

YES NO

Joseph Conant:

YES NO

2. Did Marc Savage prove by a preponderance of the evidence that any of the Defendants, motivated by racial and/or religious animus, unlawfully discriminated against him by subjecting him to, failing to remedy, or perpetuating a racially and/or religiously hostile work environment?

The City of Springfield:

YES

NO

Bernard Calvi:

YES

NO

Joseph Conant:

YES

NO

If your answer is "No" as to each of the Defendants in both Questions 1 and 2, that ends your deliberation as to Marc Savage's claims against the Defendants.

If your answer is "Yes" as to any of the Defendants on Questions 1 and/or 2, go to Question 3.

Note: If you answered "Yes" as to any of the Defendants on Questions 1 and/or 2, then you should award Mr. Savage either compensatory damages or nominal damages. However, you should **not** award both compensatory and nominal damages.

3. Did Marc Savage prove by a preponderance of the evidence that he should be awarded compensatory damages?

YES

NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ _____

-OR-

4. Do you find by a preponderance of the evidence that Marc Savage should be awarded nominal damages?

YES

NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ _____

5. Did Marc Savage prove by a preponderance of the evidence that he should be awarded punitive damages?

YES NO

If your answer is "Yes," state the amount.

\$ _____

B. Claims of Randolph Blake

1. Did Randolph Blake prove by a preponderance of the evidence that any of the Defendants retaliated against him based on his participation in protected activities by subjecting him to a retaliatory hostile work environment or by other retaliatory acts?

The City of Springfield:

YES NO

Bernard Calvi:

YES NO

Joseph Conant:

YES NO

2. Did Randolph Blake prove by a preponderance of the evidence that any of the Defendants, motivated by racial animus, unlawfully discriminated against him by subjecting him to, failing to remedy, or perpetuating a racially hostile work environment?

The City of Springfield:

YES NO

Bernard Calvi:

YES NO

Joseph Conant:

YES NO

If your answer is "No" as to each of the Defendants in both Questions 1 and 2, that ends your deliberation as to Randolph Blake's claims against the Defendants.

If your answer is "Yes" as to any of the Defendants on Questions 1 and/or 2, go to Question 3.

*Note: If you answered "Yes" as to any of the Defendants on Questions 1 and/or 2, then you should award Mr. Blake either compensatory damages or nominal damages. However, you should **not** award both compensatory and nominal damages.*

3. Did Randolph Blake prove by a preponderance of the evidence that he should be awarded compensatory damages?

YES NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ _____

-OR-

4. Do you find by a preponderance of the evidence that Randolph Blake should be awarded nominal damages?

YES NO

If your answer is "Yes," state the amount or, if none, write the word "none."

\$ _____

5. Did Randolph Blake prove by a preponderance of the evidence that he should be awarded punitive damages?

YES NO

If your answer is "Yes," state the amount.

\$ _____

The undersigned foreperson of the jury hereby certifies that the members of the jury unanimously agree to the above findings.

6/25/2024 Date

A handwritten signature in blue ink, appearing to be a stylized 'J' or a similar character, is written over a horizontal line.

Foreperson's Signature